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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. M:07-5994-SC
MDL No. 1917

This Document Relates to

Case No. 3:11-cv-05513-SC

Electrograph Systems, Inc. et al. v. Hitachi, Ltd., et al., No. 11-cv-01656;

Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Target Corp., et al. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Interbond Corporation of America v. Hitachi, et al., No. 11-cv-06275;

Office Depot, Inc. v. Hitachi, Ltd., et al., No. 11-cv-06276;

CompuCom Systems, Inc. v. Hitachi, Ltd. et al., No. 11-cv-06396;

Costco Wholesale Corporation v. Hitachi, Ltd., et al., No. 11-cv-06397;

P.C. Richard & Son Long Island Corporation, et al. v. Hitachi, Ltd., et al., No. 12-cv-02648;

Schultze Agency Services, LLC v. Hitachi, Ltd., et al., No. 12-cv-02649;

Tech Data Corporation, et al. v. Hitachi, Ltd., et al., No. 13-cv-00157;

Sharp Electronics Corp., et al. v. Hitachi, Ltd., et

STIPULATION AND [PROPOSED] ORDER EXTENDING THE DEADLINE TO FILE MOTION TO COMPEL THOMSON TO RESPOND TO DIRECT ACTION PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION

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1 *al.*, No. 13-cv-01173;

2 *Sharp Electronics Corp. et al. v. Koninklijke*
3 *Philips Electronics, N.V., et al.*, No. 13-cv-
4 02776;

5 *Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;

6 *Sears, Roebuck and Co., et al. v. Technicolor SA,*
7 *No. 13-cv-05262;*

8 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*
9 *No. 13-cv-05264;*

10 *Schultze Agency Services, LLC v. Technicolor*
11 *SA, et al.*, No. 13-cv-05668;

12 *Target Corp., v. Technicolor SA, et al.*, No. 13-
13 *cv-05686;*

14 *Costco Wholesale Corporation v. Technicolor*
15 *SA,, et al.*, No. 13-cv-005723;

16 *Electrograph Systems, Inc., et al. v. Technicolor*
17 *SA, et al.*, No. 13-cv-05724;

18 *P.C. Richard & Son Long Island Corporation, et*
19 *al. v. Technicolor SA, et al.*, No. 13-cv-05725;

20 *Office Depot, Inc. v. Technicolor SA, et al.*, No.
21 *13-cv-05726;*

22 *Interbond Corporation of America v. Technicolor*
23 *SA, et al.*, No. 13-cv-05727.

24 *ViewSonic Corporation, v. Chunghwa Picture*
25 *Tubes, Ltd., et al.*, 3:14cv-02510.

26 This Stipulation and Proposed Order Extending the Deadline to File Motion to Compel
27 Thomson to Respond to Direct Action Plaintiffs' First Set of Requests for Admission between
28 certain Direct Action Plaintiffs ("DAPs"), on the one hand, and defendants Thomson S.A.
(n/k/a Technicolor SA); Thomson Consumer Electronics, Inc. (n/k/a Technicolor USA,
Inc.) (collectively, "Thomson"), on the other hand, is made with respect to the following facts
and recitals:

WHEREAS, on March 21, 2014, the Court entered a scheduling order setting the close of
fact discovery for September 5, 2014. *See* Dkt. No. 2459;

WHEREAS, the deadline to file any motion to compel after the discover cut-off is

1 September 12, 2014 (L.R. 37-3);

2 WHEREAS, on August 1, 2014, the DAPs served their First Set of Requests for
3 Admission on Thomson;

4 WHEREAS, on September 5, 2014, Thomson served its Responses to DAP's First Set of
5 Requests for Admission and stated objections on various grounds;

6 WHEREAS, on September 10, 11, 12, and 19, 2014, counsel for the undersigned parties
7 held telephonic meet and confers to discuss deficiencies in Thomson's responses identified by
8 DAPs and have a bona fide intent to continue doing so;

9 WHEREAS, on September 12, 2014, the undersigned parties filed a stipulation extending
10 DAPs' deadline to file a motion to compel relating to DAPs' First Set of Requests of Admission
11 until September 22, 2014, *see* Dkt. No. 2840;

12 WHEREAS, the undersigned parties desire to continue to meet and confer regarding
13 Thomson's responses to DAPs' First Set of Requests for Admission;

14 WHEREAS, the DAPs and Thomson have conferred by and through their counsel and,
15 subject to the Court's approval, HEREBY STIPULATE AS FOLLOWS:

- 16 1. Subject to the parties' meet and confer discussion, the Plaintiffs provided
17 Thomson with a revised list of documents.
- 18 2. Subject to the parties' meet and confer discussion, Thomson will review
19 the revised list for inclusion on, and will consider executing, a declaration
20 or stipulation related to their authenticity and business record status by
21 September 26, 2014.
- 22 3. The undersigned parties agree to extend the deadline for the Plaintiffs to
23 file a motion to compel relating to the Plaintiffs First Set of Requests for
24 Admission, to the extent one is deemed necessary by Plaintiffs, to October
25 3, 2014.

26
27 PURSUANT TO STIPULATION, IT IS SO ORDERED.
28

Dated: 10/10/2014


Hon. Samuel Conti
United States District Court Judge

DATED: September 22, 2014

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Appliance, Inc., Schultze Agency Services LLC on behalf
of Tweeter Opco, LLC and Tweeter Newco, LLC*

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